

MARYLAND STADIUM AUTHORITY

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Thursday, July 05, 2012

Via email: narrowbanding@fcc.gov

Federal Communications Commission
Public Safety and Homeland Security Bureau
Office of the Bureau Chief
445 12th Street, S.W.
Washington, DC 20554

RE: Request for Waiver of Section 90.209(b) of the Commission's Rules

Dear Mr. Turetsky;

The Maryland Stadium Authority Department of Public Safety and Security requests a waiver for implementation of the requirements of the Code of Federal Regulations, Title 47, Section 90.209(b)(5) for private land mobile radio licensees in the 150-174 MHz and 421-512 MHz bands to migrate to narrowband technology by January 1, 2013. The Authority is requesting an extension to comply with the requirements for station WPMM282, for which it is licensed, as well as interdependent stations WQNQ550, WPMQ692, and KB38808, for the reasons set forth below.

1. The State of Maryland Stadium Authority was established in 1986 by the Maryland General Assembly as an independent state agency. The Authority owns and operates the Camden Yards Sports Complex, an 85-acre site located in Baltimore, Maryland consisting of Oriole Park at Camden Yards, home to Major League Baseball's Baltimore Orioles, M&T Bank Stadium, home to the National Football League's Baltimore Ravens, the B&O Warehouse, an eight-story Class "A" commercial building, and Camden Station, a three-story commercial building.
2. The Authority's Department of Public Safety and Security is a fulltime special police and security force responsible for safety and security operations at the Camden Yards Sports Complex. The Department coordinates with federal, state and local public safety agencies, as well as with commercial partners on site, including Baltimore Orioles, Baltimore Ravens, Maryland Sports Services, Aramark Food Services, Central Parking, S.A.F.E. Management, Tenable Guard Services and Chimes International. Our

commercial partners are an integral component in the Department's public safety operations and have key roles delineated in the Camden Yards Sports Complex Emergency Response Plan.

3. The Authority is heavily dependent upon mobile radio communications for safety and security operations. There are over 1,000 radios deployed at the complex. A large portion are owned and maintained by our commercial partners. For interoperability, all radios are programmed for communications between the commercial partners and the Authority's security and emergency operations frequencies.

4. The Authority is licensed for station WPMM282 in the Public Safety Pool (PW). Three commercial partners at the complex have individual station licenses that are interdependent to the Authority's license, specifically Maryland Sports Service WQNN550, Baltimore Ravens WPMQ692, and Baltimore Orioles KB38808, all in the Industrial/Business Pool (IG). The other commercial partners own their own radio equipment and share in the use of the frequencies belonging to all of the above station licenses.

5. December 7, 2011 a review of the narrowband requirements revealed one-half of the Authority's radios were not compatible with the technology. The cost associated with replacing the radios was unanticipated and not provided for in the FY2012 budget.

6. January 9, 2012 funding for the purchase of radios was approved for the FY2013 budget. March 13, 2012 in accordance with state procurement laws the Authority published a solicitation notice to vendors for bid proposals on the purchase of the new radios. April 11, 2012 a procurement contract for the purchase of new radios was executed by the Authority. All replacement radios will be delivered by July 31, 2012, upon which time all equipment in use at the complex will be compatible with narrowband operations.

7. The Authority and its partners are not able to perform narrowband operations prior to the delivery of the new radios. Doing so will result in a significant number of radios being rendered inoperable, which will negatively impact the Authority's ability to provide adequate public safety and security communications during professional sporting events at the complex.

8. June 21, 2012 the Authority convened a meeting of all commercial partners and their respective radio service providers to coordinate narrowband operations for the complex. Interoperability and interdependencies on shared radio frequencies between

the Authority and partners necessitates all radio equipment on the complex undergo narrowband operations simultaneously. Consensus of the group in identifying a suitable window for narrowband operations prior to December 31, 2012 could not be achieved due to the public safety requirements and commercial operations for events occurring at the complex through the remained of 2012.

9. The window of opportunity to perform narrowband operations prior to January 1, 2013 is extremely narrow. The Baltimore Orioles 2012 season is April 6, 2012 to September 30, 2012 with possible championship games to November. The Baltimore Ravens 2012 football schedule is August 17, 2012 to December 23, 2012 with possible play-off games in January 2013. In addition to the sports teams overlapping schedules, the complex is hosting the Baltimore Grand Prix (August 31- September 2), Barclay's International Soccer, African American Festival and dozens of other events through the end of 2012.

Given the unique government-commercial partnerships, radio interoperability requirements for public safety operations, and radio frequency interdependencies, the Authority believes compliance with narrowband requirements by January 1, 2013 will adversely impact public safety operations at the Camden Yards Sports Complex. The Authority respectfully requests consideration for a waiver of Commission's Rules on narrowband operation for stations WPM282, WQ250, WPM692, and KB38808. The Authority assures the Commission it can fully comply with narrowband requirements by March 1, 2013.

Respectfully Submitted,



Vernon J. Conaway Jr.

Director, Public Safety and Security
Maryland Stadium Authority